

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**Docket Ref No. \_\_\_\_\_**

**ORDER PURSUANT TO BANKRUPTCY RULE 2004  
AND LOCAL RULE 2004-1 DIRECTING THE PRODUCTION OF DOCUMENTS**

Upon consideration of the motion (the “Motion”)<sup>2</sup> filed by Givaudan SA (together with its direct and indirect subsidiaries, “Givaudan”) for entry of an order authorizing and directing limited and targeted document production from the above-captioned debtors and debtors-in-possession (the “Debtors”), as more fully set forth in the Motion; and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157, and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that Givaudan’s notice of the Motion and opportunity for a hearing on the Motion were adequate and no other or further notice need be given; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

“Hearing”); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and any objections to the requested relief having been withdrawn, resolved or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The Debtors are directed to produce the 2021 DSM Transaction Documents to Givaudan by no later than October 20, 2023.
3. Givaudan’s rights are reserved to request additional discovery and/or examinations, including, without limitation, requests based on any information that may be revealed as a result of the discovery authorized pursuant to this order.
4. This order is without prejudice to the right of the Givaudan to seek further discovery pursuant to Bankruptcy Rule 2004 or otherwise of any other person or entity.
5. Givaudan is authorized to take all actions necessary to effectuate the relief granted pursuant to this order.
6. The terms and conditions of this order shall be effective and enforceable immediately upon its entry.
7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this order and to interpret, implement and enforce the provisions of this Order.